

RI004 Morat

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"Recirculated Draft PEIR Comments"
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814

Council:

I am really unhappy that you opted to restrict comments on this enormous, lengthy and complex environmental review of the Program EIR. As noted on Page ES-11 of the Recirculated Draft, lines 4 through 7: "Under CEQA Guidelines Section 15088.5, when a portion of an EIR is recirculated the lead agency may request that the reviewers limit their comments to the recirculated portion, and to refrain from commenting on the unrevised portions. This Recirculated Draft PEIR is solely adding the analysis of the Revised Project as the new alternative. It does not revise the Draft PEIR's analysis of the Proposed Project or any of the other alternatives. Accordingly, the Council requests that comments be limited to the analysis of this Recirculated DPEIR."

Considering the duration and rigor of your process and the desire for public involvement, what is to be lost by not allowing any comment to be made now? You could have advised reviewers to comment as they wish, please do not duplicate earlier comments that they had submitted, and warned them that only comments relevant to the Recirculated Draft PEIR or new and process-essential information would be acknowledged and/or addressed. I am reviewing the document for personal reasons; I am a stakeholder of one. I do not have the resources of the stakeholders who have benefitted so tangibly and enormously, subsidized if you will, from decades of Central Valley Rivers and Delta water supplies.

I will pursue my concerns on process with my State legislators as to how an unattached stakeholder who had an interest was ever expected to catch and hang on to this runaway train for three years. I feel like I am a stakeholder who has not benefited but rather have been hurt by Sacramento-San Joaquin River and Delta water exploitation – fisherman, hunters, non-consumptive users of wildlife, boaters, farmers, and the many health-impacted drinkers of Delta water.

I did make a comment at a public scoping session once, and that will be the basis for my one comment herein.

The geographic scope of the Delta Plan makes a huge and fatal mistake in not including the San Francisco Bays. Those parts of this estuary downstream of Suisun - San Pablo Bay, Central Bay, and South Bay - are integral parts of the estuary and undeniably affected by changes in hydrology (flow magnitudes and timing) and water qualities (including sediments). Did CEQA drive this document or the Delta Restoration Act of 2009?

Response to comment RI004-1

Please refer to Master Response 2. The Draft EIR (Volumes 1 and 2), which analyzes the Fifth Staff Draft Delta Plan, was circulated for public review and comment for 90 days beginning on November 4, 2011 and ending on February 2, 2012. In November 2012, the Recirculated Draft Programmatic EIR (Volume 3 of the Draft EIR), which analyzes the Final Staff Draft Delta Plan (the "Revised Project"), was circulated for review and comment for 45 days beginning on November 30, 2012 and ending on January 14, 2013. When an EIR is submitted to the State Clearinghouse, the review period shall not be less than 45 days unless a shorter period is approved by the State Clearinghouse (CEQA Guidelines § 15105(a)). The Council will consider any comments it received during the public review periods and prepare a written response to any comments on significant environmental issues as required by Public Resources Code section 21091(d).

Response to comment RI004-2

As described in Section 1 of the Draft Program EIR and Section 3 of the Recirculated Draft EIR, the study area includes "the Delta and Suisun Marsh, the Delta Watershed that contributes water to the Delta, and areas outside of the Delta that use Delta water." As described in Section 3, Page 3-1 Lines 31 through 33 of the DEIR, the Delta watershed is "represented by the drainage of the Central Valley except for the Tulare Lake area. Areas outside of the Delta that use Delta water include Tulare Lake, San Francisco Bay, Central Coast, and Southern California." The hydrologic areas presented in Section 3 of the Draft Program EIR are based on the hydrologic basins used by the Department of Water Resources in 2009 Water Plan Update.

My anger is directed at institutional and collective behaviors that have been occurring for many decades, not individual members of the Delta Stewardship Council.] RI004-3

Firmly,



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Response to comment RI004-3

Comment noted.